



FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

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**SENSITIVE**

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**MEMORANDUM**

**TO:** The Commission

**FROM:** Lisa J. Stevenson  
Acting General Counsel

Kathleen M. Guith  
Acting Associate General Counsel for Enforcement

**BY:** Mark Allen *MA*  
Assistant General Counsel

Christine C. Gallagher *CCC by MA*  
Attorney

**SUBJECT:** MUR 6639 (Gary Johnson 2012, Inc.)  
Pre-Probable Cause Conciliation

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Attached is a conciliation agreement signed by Christina Sirois in her official capacity as treasurer, on behalf of Gary Johnson 2012, Inc. (the "Committee") (Attachment 1). The agreement would settle violations of 52 U.S.C. § 30104(b) and 11 C.F.R. §§ 104.3 and 102.9(e) stemming from the Committee's failure to disclose \$447,567 in debts and obligations and use of \$12,396 in general election contributions for primary election expenses.<sup>1</sup> We recommend that the Commission accept the negotiated agreement and close the file.

<sup>1</sup> See Certification, MUR 6639 and Audit Referral 15-06 (Apr. 26, 2016) (finding reason to believe that the Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. §§ 104.3 and 102.9(e) and authorizing pre-probable cause to believe conciliation).

Therefore, we recommend that the Commission accept the attached conciliation agreement and close the file.

**RECOMMENDATIONS:**

1. Accept the attached conciliation agreement with Gary Johnson 2012, Inc. and Christina Sirois in her official capacity as treasurer;
2. Approve the appropriate letter;
3. Close the file.

<sup>5</sup> See FEC Amended Form 1 Statement of Organization, Gary Johnson 2012, Inc and Christina Sirois in her official capacity as treasurer (May 23, 2016).